

ORIGINAL

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS 2014 JAN 23 PM 3:34
FORT WORTH DIVISION

CLERK OF COURT

UNITED STATES OF AMERICA

v.

LINDA RYAN (01)

§
§
§
§
§

NO.

4-14CR-016-0

INFORMATION

The United States Attorney Charges:

Introduction

A. The United Steelworkers International (USW) Local 13-208, hereinafter "Local 13-208" was, at all times material to this Indictment, a union representing employees at Medco Health Solutions in the Fort Worth Division of the Northern District of Texas and elsewhere.

B. At all times material to this Indictment Local 13-208 was a labor organization engaged in an industry affecting commerce within the meaning of Sections 402(i) and 402(j) of Title 29, United States Code.

C. The defendant **Linda Ryan**, was appointed secretary-treasurer of Local 13-208 in approximately 2005, elected to that office in about 2008, and remained an officer of the union until she left the union in September, 2011.

D. At all times material to this Indictment, Local 13-208 maintained a checking account which required signatures from two of the three officers of the union on checks.

Count One

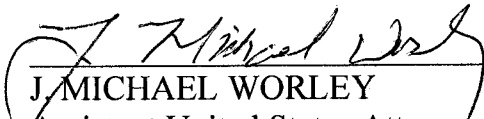
Theft of Assets of Labor Organization Affecting Commerce
(Violation of 29 U.S.C. § 501(c))

1. The United States Attorney re-alleges the allegations of the Introduction to this Information.

2. From on or about January 1, 2010, until December 31, 2010, in the Fort Worth Division of the Northern District of Texas, the defendant **Linda Ryan**, while an officer, that is, Secretary-Treasurer of the United Steelworkers International (USW) Local 13-208, a labor organization engaged in an industry affecting commerce, did embezzle, steal and unlawfully and willfully abstract and convert to her own use the moneys, funds, securities, property, and other assets of said labor organization in the approximate amount of \$21,109.18.

In violation of 29 U.S.C. § 501(c).

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